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December 30, 2020

**Via ECF**

Magistrate Judge Robert M. Levy  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: Singh, Devander v. Ronald Poles, Penske Truck Leasing  
Co., L.P., Penske Truck Leasing Corporation, Costco  
Wholesale Corporation, Costco Wholesale Membership, Inc.  
and Sahib Walia  
Civil Action No: 1:19-CV-1984-JBW-RML

Dear Magistrate Judge Levy:

This office represents the defendants, Ronald Poles and Costco Wholesale Corporation, in the above-matter. Please allow this letter to serve as a joint request for a 60-day extension of the current discovery deadline of December 31, 2020.

Notwithstanding the continued delays caused by the COVID-19 pandemic, the parties have been diligently working towards completing expert discovery. Plaintiff recently exchanged expert disclosures for an economist and physician. In addition, counsel is in the process of preparing disclosures for plaintiff's treating doctors. Defendants are working to obtaining remaining medical records and finalizing reports from its experts for disclosure. Provided there are no further unanticipated delays, the parties expect to be in a position to complete the aforementioned within the next two months.

Accordingly, it is respectfully requested that the current discovery deadline be extended to March 1, 2021. Assuming this

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application is granted, it is further requested that the current court conference scheduled for January 12, 2021 be adjourned for 60 days, or for a date that is convenient for the Court, to allow for the parties to conclude this aspect of discovery. Once completed, we should be in a position to set a schedule for expert depositions.

Plaintiff joins in this application as outlined herein. There has been one prior formal request to extend discovery which was granted by Your Honor. Thank you for the opportunity to address the Court in this matter.

Very truly yours,

*Sal F. DeLuca*

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